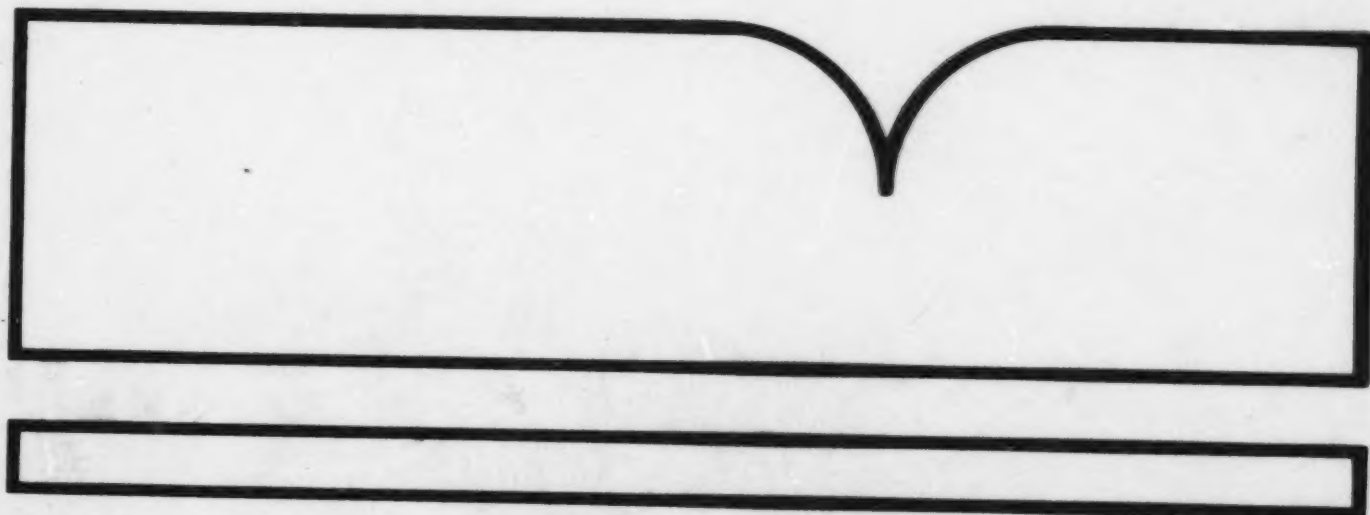


U.S. Environmental Protection Agency Public
Awareness Guidance for Inspection and
Maintenance Programs

(U.S.) Environmental Protection Agency
Ann Arbor, MI

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U.S. ENVIRONMENTAL PROTECTION AGENCY

PUBLIC AWARENESS GUIDANCE

FOR

INSPECTION AND MAINTENANCE PROGRAMS

JANUARY 1981

PRODUCT OF:
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16. ABSTRACT

This document was prepared for use by affected states or local agencies during the development and implementation of the public information element of their inspection/maintenance programs. The I/M public awareness objectives are to achieve a widespread public understanding that air pollution is a serious problem, that vehicle emissions are major contributors to this problem, and that I/M is an effective way to solve the problem. This guidance recommends an approach to accomplish these objectives.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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OFFICE OF
AIR, NOISE, AND RADIATION

SUBJECT: EPA Public Awareness Guidance
for Inspection and Maintenance Programs

FROM : David G. Hawkins, Assistant Administrator
for Air, Noise and Radiation (ANR-443) *DH*

MEMO TO: Regional Administrators, Regions I-X

The attached EPA Public Awareness Guidance materials have been prepared for use by affected states or local agencies during the development and implementation of the public information element of their I/M programs. This Guidance has been reviewed by the EPA Regions and representatives of states with operating programs. It is also consistent with other Agency public information guidance.

The I/M public awareness objectives are to achieve a widespread public understanding that air pollution is a serious problem, that vehicle emissions are major contributors to this problem, and that I/M is an effective way to help solve the problem. The Guidance recommends an approach to accomplish these objectives. It reviews I/M policy and the role of public awareness in the implementation of I/M. It discusses the phases of I/M implementation from adoption of enabling legal authority through development and operation of the program. The Guidance suggests a process that can be used to develop an I/M Public Awareness plan, and provides much practical information for planning a media strategy. It also provides samples of major I/M themes that could be used to promote increased public understanding.

I strongly believe that each state should develop in a timely manner a comprehensive public awareness plan of action that will accomplish the I/M program objectives. I/M cannot be successful without a full understanding of what it is and how it works. The EPA Regional Offices should assist the states in the preparation and implementation of this plan using these Guidance materials and by placing high priority on the use of Section 105 air program grant funds to support this effort. For instance, one positive step that I/M states could take to develop and implement an effective public awareness program, would be to assign an I/M public awareness coordinator to be responsible for the action plan and all other I/M public information activities to insure the program's tasks will be carried out. I hope that the Regional Offices would encourage this initiative by using the 105 Grant process and the State/EPA Agreement to provide for the salary of such an individual.

Present EPA policy requires a public information effort through the SIP process and as part of each state's I/M program. EPA has proposed as 1982 SIP policy that affected states should submit their I/M public awareness plan (45 FR 64856, 9/30/80). As with all SIP elements, states must show that sufficient manpower and financial resources have been committed to carry out the plan's provisions. The states' public awareness program will be formally reviewed by EPA as part of the 1982 SIP process. This Guidance is provided to help states prepare an adequate plan. EPA and the states should begin certain public awareness activities now to assure that necessary tasks are being accomplished prior to I/M start up.

I hope that you will make this Guidance available to all affected states as quickly as possible. If you have any questions concerning the Public Awareness Guidance for I/M Programs, please contact me or Tom Cackette, Chief of the I/M Staff at (FTS) 374-8374.

Attachment

cc: Joan Nicholson, Director, OPA
Inez Artico, OPA
Public Awareness Directors, Regions I-X
I/M Contacts, Regions I-X
Tom Cackette, Chief I/M Staff

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for
Inspection and Maintenance Programs

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I. Purpose of Guidance

Inspection/Maintenance (I/M) programs, as well as other air quality control strategies, have often been initiated with only a modest level of public awareness and understanding. The result frequently is widespread misunderstanding, mistrust, and resentment by the public of these regulatory programs. This is why a well planned Public Awareness Program to foster public understanding is a necessary element in the development and implementation of a successful I/M program. Unless the public and responsible elected officials are kept informed of how I/M operates and how well it is achieving its goals, I/M programs may never be able to achieve the emission reduction benefits that are possible and that were committed to by the state.

This guidance draws on the experiences of operating I/M programs as well as on established public awareness techniques to assist designated state or local agency officials in carrying out I/M public awareness functions.

II. Policy and Objectives

Policy - This I/M Public Awareness Guidance reflects and is consistent with other EPA policy on public information and participation.¹ The Agency's policy states that public information and participation will continually be provided for, encouraged and assisted to the fullest extent possible. With respect to I/M programs, this guidance applies to agencies responsible for program development and implementation. Present EPA policy requires a public information effort through the SIP process and as part of each state's I/M program. EPA has proposed as 1982 SIP policy that affected states must submit their I/M public awareness plan. As with all SIP elements, states must show that sufficient manpower and financial resources have been committed to carry out the plan's provisions. The state's public awareness program will be formally reviewed by EPA as part of the 1982 SIP process. This guidance is provided to help states prepare an adequate plan. It only makes good sense to carefully plan and commit necessary resources to carry out such an important I/M program element. The EPA Regional Offices and states should be working closely together now, because many needed information activities should be well underway by 1982.

Objectives - To achieve widespread public awareness and understanding that air pollution is a serious problem, that vehicle emissions are major contributors to this problem, and that I/M is an effective way to help solve the problem.

1. Information - Increase the public's awareness of air quality issues, the rationale and benefits of I/M programs and their relationship to other attainment strategies.
2. Involvement - Encourage active involvement in the I/M development and implementation process from a broad range of affected and interested constituents.

¹ EPA/DOT Expanded Guidelines on Public Participation in the June 23, 1978 Federal Register and EPA Proposed Policy on Public Participation in the April 30, 1980 Federal Register.

3. Communication - Establish and maintain an effective, continuing communication program with the affected constituents to foster a spirit of mutual trust.

III. Applicability and Funding

Applicability - This guidance applies to the state or local agencies responsible for the development and implementation I/M programs. Although many tasks of an I/M public awareness program may be carried out by a contractor or public interest group(s), the designated state or local agency will be responsible and accountable for the programs overall coordination and implementation.

Funding - The responsible agencies should allocate sufficient financial resources for the development and implementation of an I/M public awareness program. To assist state/local agencies, EPA provides Section 105 and Section 175 funds that can be used for this activity. EPA believes that a state/local PA coordinator is needed to oversee the development and implementation of an effective public awareness program. EPA can support such a state/local initiative through the 105 grant process and the State/EPA Agreement by providing for the salary of such an individual. However, the responsible agencies should count on state funds or I/M fees in the future to help support the routine public information effort. EPA also encourages 105/175 grantees to pass-through funds to a broad base of capable, interested and affected constituency groups who have expertise in public education.

IV. Discussion of I/M Phases

The I/M phases include adoption, development, and operation. Depending on the program's phase, the message, audience, technique, and timing of public awareness activities will vary. The discussion on I/M phases which follows, specifically relates to Public awareness planning. The recommended process for plan development is outlined in Section V of this Guidance.

Phase 1. Adoption

The first step in getting an I/M program underway is the adoption of enabling legal authority. To comply with the requirements of the 1977 Amendments to the Clean Air Act, major urban non-attainment areas that cannot meet the ozone or carbon monoxide standards by 1982 must have authority to implement and enforce I/M to have their compliance deadline extended until 1987. An interim public awareness plan is useful to inform elected officials and citizens about the nature of the air quality problem, the contribution made by motor vehicle exhaust emissions, and how I/M can help solve the problem.

For the purpose of actions recommended later in this Guidance, it is assumed that a state already has legal authority to implement I/M. However, elected officials must continually be informed about the progress and effectiveness of I/M programs.

Phase 2. Development

Once I/M legal authority has been adopted and the state has committed to a schedule for its implementation, program development must begin. Critical to the I/M program is the development of a comprehensive public awareness plan of action. An assessment of public knowledge and attitudes about I/M may be needed. Two approaches can be taken. The first is a public opinion survey; the second, a voluntary emission testing demonstration. These approaches can help determine at what level an education campaign should be initiated and help identify specific issues on which to focus. Refer to Appendix A.2 for a sample survey questionnaire. A voluntary program is valuable because it allows the auto service industry and specifically mechanics to get acquainted with the emission test and repair procedures. Operating programs indicate that their success, while largely dependent on an informed public, is also dependent on well informed and trained mechanics. Additionally a "voluntary" or "free demonstration" program allows the public and the media an opportunity to get acquainted with emission testing firsthand.

Groups who have an interest in air quality or I/M should be consulted in the development of the public awareness plan, and encouraged to participate in informational activities. A number of groups already exist. American Lung Association (ALA) chapters across the country are supporting I/M to further reduce air pollution and its related lung problems. The League of Women Voters and Sierra Club also have been active supporters in the air quality efforts. Other groups directly affected by the program (i.e. auto services industry) should also be involved.

Working with the media during all I/M phases, but particularly during program development, is most useful to the public awareness effort. Establish and maintain liaison with local T.V./radio news editors and editorial board members of daily and weekly newspapers. To brief reporters on the program, develop an I/M press kit and hold briefing sessions. Guest appearances on T.V. and radio talk shows is an effective method of reaching a large portion of the public, especially during the 3-4 month period before start-up of mandatory I/M.

Phase 3. Operation

After completion of Phase 2, the public should have a good understanding of the air quality issues, the need for and benefits of I/M. Prior to start-up, citizens need to know what to expect of the program and how they will be affected. A pamphlet can be useful to explain the inspection process. Just prior to the program's start-up and then continually thereafter, this information should be distributed extensively via Motor Vehicle Department registration mailing, as is presently being done in operating programs, or by using several media modes, such as public service spots, talk shows, press releases, etc. Consumer "hotlines" are being successfully used in existing programs in responding to concerns about I/M and related issues. Program information materials should be updated when necessary.

V. Program Elements and Procedures

The following outline, along with the materials contained in the Appendix, are provided as a guide for developing an I/M public awareness plan. An effective plan should contain the basic public information elements: commitment; identification; outreach, interaction and responsiveness; evaluation and modification; feedback and progress reporting.

A. Commitment

The responsible agency should:

1. Designate an I/M public awareness coordinator. Select the most capable and available person to develop and implement the plan. Ideally, someone knowledgeable about air quality issues and experienced in educating the public and working with the media should be assigned this task. Assess available resources, talent, technical expertise, development and implementation capabilities either in-house, or within other agencies or special interest groups. The coordinator would be responsible for the action plan and all other I/M public information activities to insure that the program's tasks will be carried out.
2. Designation of a task force should be considered to assist in plan development and implementation. Select representatives from either the health community, public interest/environmental groups, business/labor, or some other group, who have an interest in air quality issues or I/M and can contribute their expertise to the development, administration and implementation for the best approach in educating the public.
3. Determine need for contractors or consultants. Through the contract process and/or on a voluntary basis, if offered, plan to use the services of interested and capable public interest groups or a professional public relations consultant. The Lung Association, League of Women Voters, Sierra Club and other such groups have a long history in air quality efforts and are able to effectively educate the public. A public relations consultant can provide professional communication advice on the most effective local public information approach to take, and later assist in developing needed materials. A consultant or a representative from a public interest group could also be considered to perform agency coordination and planning activities should no qualified candidate be available to carry out the public awareness program.
4. Develop a budget and determine sources and available amounts of public awareness funding. Refer to Section III, Applicability and Funding for funding sources. Experience in states with established I/M programs shows that much can be accomplished with a small budget by being creative and taking advantage of available I/M materials.

B. Identification

1. Identify audiences and develop a mailing list. Constituencies interest in, and potentially affected, by I/M issues and programs should be identified and inventoried at the beginning of the process. The mailing list should be updated when necessary, but at a minimum once a year. The following is a listing of audiences which should be considered:

State, local government

air pollution control agencies
motor vehicle agencies
state legislators/staff
energy and transportation officials
elected officials/staffs

Public Interest Groups

League of Women Voters
American Lung Association
consumer protection groups
Sierra Club
clean air coalitions/environmental groups
League of Cities
Conference of Mayors
National Association of Counties
National Conference of State Legislators

Auto Related Services

automotive service organizations
dealers associations
garages and service stations associations
auto parts manufacturers and suppliers
emission analyzer manufacturers
gasoline retailers

Civic Groups

Chamber of Commerce
Jaycees
Kiwanis
Urgan League
NAACP

Organized Auto Owners

auto clubs
sports, recreational groups

Health Groups

State, County Medical Societies
Public Health Association

Educational Institutions

public schools
junior high schools
vocational schools
community colleges
universities

Media

newspaper (daily/weekly)
trade press
special press
radio stations
television stations

2. Identify general message and style. This is the focal point of the plan. Since the goals of air pollution control and I/M affect different people in different ways, decide on a simple format and message to coincide with each I/M phase. During the development phase, the message will vary at particular stages. Tailor your message to the target audience. The following basic messages with supporting information are recommended examples:

- ° "Air pollution is harmful to public health and the quality of all our lives."

The public should understand the various types of pollutants, their sources and each one's known deleterious effects. They should be given accurate information about the dramatic short-term consequences of extreme levels of pollution, as well as the known hazards of long-term exposure to lower levels of contaminants. Additionally, the public should be made aware of substantial progress being made in the improvement of ambient levels of air pollution in our urbanized areas. This results from major emission reductions of both stationary and mobile sources. The information program could highlight the national trends in reducing carbon monoxide and hydrocarbons as published by the Council on Environmental Quality, and by using state and local air quality data.

- ° "Cars are major contributors to the air quality problem, especially when they are not maintained."

The distinction should be made between stationary and mobile sources since the control options vary greatly depending on the emission source. Address other transportation control measures which are being considered in local areas to achieve acceptable air quality levels. Make it clear that improper vehicle maintenance and excessive driving create additional pollution. Cars emit three major polluting gases - carbon monoxide (CO), hydrocarbons (HC), and nitrogen oxides (NOx). Levels of CO and ozone in the atmosphere above the minimum health standards can cause severe health problems among children, the aged, and those with respiratory and heart ailments. The primary causes of high vehicle emission levels are maladjustments, inadequate maintenance, fuel switching and tampering. (Fuel switching to leaded gasoline will destroy the catalytic convertor, causing vehicles to exceed CO and HC tailpipe emission standards.) Ninety percent of airborne lead in cities comes from vehicle exhaust. This causes many serious health problems.

Broadening the public's understanding of the effects of motor vehicle related air pollution will set the stage for introducing I/M programs.

- ° "I/M compliments the Federal Motor Vehicle Control Program (FMVCP) by assuring compliance of vehicle exhaust emissions and thus control air pollution."

I/M works to lower air pollution levels by requiring the periodic inspection of in-use motor vehicles, and emission related maintenance for those cars which fail to meet prescribed inspection standards. The program is proving to be one of the most cost-effective available transportation control measures to reduce HC and CO emissions. Existing operating programs illustrate that I/M is effective in substantially reducing tailpipe emissions. In Portland, which has had an I/M program since 1975, vehicles emit 20% less HC and 36% less CO than similar vehicles in Eugene, Oregon which does not have an I/M program.

The final justification for I/M as a control strategy has to do with its role in the overall Federal Motor Vehicle Control Program (FMVCP). The three main elements of the FMVCP address vehicle design (certification), vehicle production (assembly line test) and vehicle durability (recall). I/M complements these programs by assuring that proper maintenance is performed. Without I/M the effectiveness of the FMVCP is greatly reduced.

- ° "I/M is an effective, reasonable program which works and is receiving public acceptance."

Major benefits are being realized from I/M programs. By sharing this information with the public, these benefits will act as incentives for proper car maintenance. Operating programs in several parts of the country show:

- I/M effectively reduces tailpipe emissions. Results from the EPA Portland Study indicate that emission reductions following maintenance of failed cars are 47% for CO and 42% for HC. Without I/M, the job of controlling automobile related pollutants is not accomplished.
- I/M effectively reduces tampering with emission control devices. A recent survey in New Jersey indicates that I/M is an effective deterrent to tampering; the tampering rate was nearly one half that of non-I/M areas.
- I/M effectively promotes energy conservation. In general, excessive emissions are a consequence of a poorly, or improperly tuned engine. Proper maintenance to manufacturer's specifications of vehicles failing the I/M test can result in 3-4% improved fuel economy.
- I/M effectively protects the investment made in your car. Since 1968 auto manufacturers have had to meet increasingly strict emissions standards. Regular and proper maintenance which is encouraged by I/M is needed to insure the continued effectiveness of air pollution control devices that are installed to meet the FMVCP program requirements.

- I/M effectively protects the consumer. The CAA requires auto manufacturers to guarantee emission control equipment for the useful life of the car -- defined as 50,000 miles or five years -- provided the car is properly maintained to manufacturer's specifications. With I/M, malfunctioning of emission control equipment can often be identified, and in many cases the repair cost will be done by the manufacturer. This is especially important for 1981 and later models which are also covered by the 207(b) emission performance warranty.
 - I/M effectively improves the quality of life. Improved air quality can minimize the cost of health care and lost work days due to respiratory illness. It can also minimize crop losses, property damage, and can increase real estate value and tourist trade.
 - I/M consumer costs are reasonable. State experience has shown that for cars failing the emission test, the average repair costs have been from \$18-\$35. Typical maintenance and repairs involve carburetor adjustments, replacement of air filters, choke adjustments and replacement of spark plugs.
 - I/M benefits the local economy. New jobs created by initial construction of inspection facilities in areas opting for a centralized program represent a definite boost to the construction industries. The development, operation and maintenance of the inspection facilities will provide some jobs for local residents. A general increase in the amount of maintenance performed will also create more jobs in the repair industry. This last point may be quite significant in some areas.
 - I/M programs have gained acceptance with the public. Public opinion surveys done in states with operating programs show that a majority of those polled responded favorably towards the program. Refer to Appendix B-2 for survey results.
3. Identify available materials. EPA has developed several basic I/M information materials. States and localities are encouraged to obtain them by contacting the EPA Regional I/M representative. Refer to Appendix B.1. for a listing of available materials from EPA. Before using any materials be sure to review them, since some of the information may be outdated or inappropriate for your specific program.
 4. Determine which materials still need to be developed. Given that the air pollution problems differ from one urban area to another, information materials will have to be developed on specific local issues. Leaflets, fact sheets, or newsletters are useful in informing certain audiences about I/M. Refer to the appendix for samples: leaflet A-1, fact sheet A-3, newsletter A-7.

5. Determine information techniques. The type of techniques will largely depend on which phase the I/M program is in, the target audience and available resources. Experience from established programs show that one of the best techniques is personal visits to key constituents, especially the media reporters. The following sample charts may be helpful to focus on the appropriate technique, and message, depending on the target audience and I/M phase being implemented. Several suggested techniques are listed beneath each chart. (Additional techniques are explained on pages 14-16. As shown in the model chart, place the technique number within the section which coincides with the audience and message. For instance, established programs indicate that emission testing demonstrations (Technique Key No. 6) are good during the "development phase" to acquaint the media and general public. Public service announcements (Technique Key No. 10) and talk show interviews, (Key No. 11) are best just prior to and during the "operation phase" to alert the motoring public of I/M. With respect to centralized vs. decentralized programs, keep in mind that the timing and technique will differ when informing the auto service industry about mechanic's training.

I/M PUBLIC INFORMATION TECHNIQUESPHASE 2: DEVELOPMENT -- SAMPLE

AUDIENCES	MESSAGES				
	Air Pollution and Health Effects	Legal Requirements	I/M Rationale and Benefits	Mechanics Training	Other
Elected Officials	← 1, 2, 4, 6, 12 (periodic briefings on all messages as required) →				
Automotive Service Industry	← 1, 2, 4, 5, 6, 12, →				
Public Interest Groups	← 1, 3, 4, 5, 6, 12, 13 →				
Business and Labor	← 1, 3, 4, 5, 6, 13 →				
Media Coverage	← 6, 7, 8, 10, 11 →				
General Public	← 2, 6 →				
Other					

KEY

- 1 = Personal visit, phone calls, correspondence
- 2 = Pamphlets, fact sheets, leaflets, etc.
- 3 = I/M Newsletter
- 4 = Slide show
- 5 = Videotape/film
- 6 = Emission clinics (I/M demos)
- 7 = Press kit

- 8 = Press release
- 9 = Feature article, Q & A column
- 10 = Public Service Announcement (PSA)
- 11 = Radio and TV talk shows
- 12 = Workshop, seminar, public meeting, briefing
- 13 = Speaking engagements
- 14 = Posters, bumper stickers, exhibits, displays

I/M PUBLIC INFORMATION TECHNIQUESPHASE 2: DEVELOPMENT -- WORK SHEET

AUDIENCES	MESSAGES				
	Air Pollution and Health Effects	Legal Requirements	I/M Rationale and Benefits	Mechanics Training	Other
Elected Officials					
Automotive Service Industry					
Public Interest Groups					
Business and Labor					
Media Coverage					
General Public					
Other					

KEY

- 1 = Personal visit, phone calls, correspondence
- 2 = Pamphlets, fact sheets, leaflets, etc.
- 3 = I/M Newsletter
- 4 = Slide show
- 5 = Videotape/film
- 6 = Emission clinics (I/M demos)
- 7 = Press kit

- 8 = Press release
- 9 = Feature article, Q & A column
- 10 = Public Service Announcement (PSA)
- 11 = Radio and TV talk shows
- 12 = Workshop, seminar, public meeting, briefing
- 13 = Speaking engagements
- 14 = Posters, bumper stickers, exhibits, displays

I/M PUBLIC INFORMATION TECHNIQUESPHASE 3: OPERATIONAL -- SAMPLE

AUDIENCES	MESSAGES				
	Air Pollution and Health Effects	Legal Requirements	I/M Rationale and Benefits	Mechanics Training	Other
Elected Officials	1, 2, 4, 6, 12 ← (periodic briefings on all messages as required) →				
Automotive Service Industry	1, 2, 4, 5, 6, 12, ← →				
Public Interest 13 Groups	1, 3, 4, 5, 6, 12, ← →				
Business and Labor	1, 3, 4, 5, 6, 13 ← →				
Media Coverage	6, 7, 8, 10, 11 ← →				
General Public	2, 6 ← →				
Other					

KEY

1 = Personal visit, phone calls,
correspondence
2 = Pamphlets, fact sheets,
leaflets, etc.
3 = I/M Newsletter
4 = Slide show
5 = Videotape/film
6 = Emission clinics (I/M demos)
7 = Press kit

8 = Press release
9 = Feature article, Q & A column
10 = Public Service Announcement (PSA)
11 = Radio and TV talk shows
12 = Workshop, seminar, public meeting,
briefing
13 = Speaking engagements
14 = Posters, bumper stickers, exhibits,
displays

I/M PUBLIC INFORMATION TECHNIQUESPHASE 3: OPERATIONAL -- WORKSHEET

AUDIENCES	MESSAGES				
	Air Pollution and Health Effects	Legal Requirements	I/M Rationale and Benefits	Mechanics Training	Other
Elected Officials					
Automotive Service Industry					
Public Interest Groups					
Business and Labor					
Media Coverage					
General Public					
Other					

KEY

- 1 = Personal visit, phone calls,
correspondence
 2 = Pamphlets, fact sheets,
leaflets, etc.
 3 = I/M Newsletter
 4 = Slide show
 5 = Videotape/film
 6 = Emission clinics (I/M demos)
 7 = Press kit

- 8 = Press release
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 10 = Public Service Announcement (PSA)
 11 = Radio and TV talk shows
 12 = Workshop, seminar, public meeting,
briefing
 13 = Speaking engagements
 14 = Posters, bumper stickers, exhibits,
displays

The following is an elaboration of public information techniques to consider during each I/M phase. These techniques are in no specific order, however most are appropriate during the development and operational phases.

- ° Contact your district legislators and brief them on progress being made in developing the program, or on how well it is working once it is in operation.
- ° Arrange workshops, seminars, and public meetings to brief citizens and other organizations on the air quality status in individual areas, and the requirements that must be met under the Clean Air Act. Emphasize I/M and brief the public on the status of existing and developing programs. Invite appropriate media. Solicit help in reaching other groups.
- ° When meetings cannot be arranged or are infeasible, write to various groups and include appropriate briefing materials. Follow up by telephone to see what additional information might be helpful.
- ° Develop a leaflet explaining I/M, and encourage other groups, gas stations and garages to distribute it. (Refer to Appendix A-1 for sample).
- ° Regularly include an I/M article in publications or newsletters.
- ° Borrow a copy of the ALA/EPA film, "On the Road to Clean Air" and other available I/M audio-visuals for showing to target audiences.
- ° Coordinate with the EPA Regional office or a local emission analyzer manufacturer to set up a free demonstration testing station in a shopping mall or urban center. This will give people an opportunity to have their car inspected for emission levels. Publicize it in local newspapers, shopping center marquees, billboards, etc. (Refer to Appendix A-6 for sample brochure).
- ° Meet with appropriate legislative staffs or committees and present facts and views at appropriate times throughout program implementation.
- ° Attend public meetings where I/M or air quality is being discussed, and present facts and views.
- ° With other community groups, sponsor a town meeting, in which legislators, State and local officials are invited to discuss air quality problems, I/M as one possible solution, and the status of I/M program development and effectiveness.
- ° Work with a health organization to develop an exhibit on the health effects of air pollution for display at a county or State fair or other well-attended events.

- ° Sponsor a poster or bumper sticker contest for school children on the benefits of I/M programs. Have various groups offer prizes and plan to exhibit in an area which is accessible to the public.
- ° Participate in national, state and local events such as Clean Air Week, parades, fairs and sports. For instance, one state program ran an I/M message across the electronic scoreboard at a local stadium. The message announced a free I/M emission demonstration taking place in the parking lot after the game.
- ° Provide high schools with information on proper auto maintenance for their driver education course.

As mentioned earlier, sound use of the media is critical for achieving program objectives. Newspapers, radio and television can alert and inform large numbers of citizens to the need for, the benefits of, the costs of the kind of I/M program that is being implemented. In addition to their news and editorial coverage, commercial and public radio and television stations are required by the Federal Communication System to determine community needs and make their programming responsive to these needs through public service announcements (PSAs) and programs. Because I/M is mandated by the U.S. Congress to improve air quality for the public good, free air time and space should be requested. It's been reported from officials of established programs that free air time has been provided by most stations just before the program would start. (Refer to Appendix A-5 for sample PSA.) Suggestions for effective use of the media follows:

- ° Invite environmental reporters and news editors to an I/M briefing, provide them with a press kit of specific information and contact people who can answer questions. Also provide them with a copy of the I/M demo videotape for broadcast.
- ° Invite press to a voluntary demonstration that is being held in the vicinity, and provide information on successful programs in other cities and states.
- ° Provide information and background on the local situation to editorial writers.
- ° Develop press releases on the rationale for I/M and build upon real events such as an ozone alert. (Refer to Appendix A-4 for sample).
- ° Encourage local newspapers to feature a question box where readers can write in questions and expect an answer.
- ° Try to get the I/M messages broadcast on radio stations during the time when people are driving to and from work.
- ° Invite reporters to public meetings and hearings and provide them with a list of contacts for their future reference, list name, title, phone number, and area of expertise, similar to a speaker's bureau list. This can be helpful when a station or newspaper plans on doing a special I/M program.

- ° Suggest a panel discussion of air quality problems and I/M's role in reducing the problem.
- ° Offer T.V. broadcasters the EPA I/M Public Service Announcements, and the I/M Demo videotape, especially during the summer ozone season.
- ° Suggest a call-in show for viewers and listeners at home to ask I/M and air quality questions of a knowledgeable person. Provide a listing of qualified speakers.
- ° Encourage a documentary or feature on the local air pollution situation and the role of I/M as one solution in reducing pollution.

Other opportunities to get I/M information to citizens are available through the trade, special press-professional and technical journals or newspapers, environmental and other newsletters, and church or civic publications. Contact the editor and provide him or her with additional information.

6. Determine implementation schedule. The timing, coordination, and responsibilities of the public awareness effort will largely determine the success and acceptance of the I/M program. For that reason a viable schedule is essential. A sample implementation schedule for centralized and decentralized programs follows:

I/M PUBLIC AWARENESS
IMPLEMENTATION SCHEDULE - DECENTRALIZED PROGRAMS -- SAMPLE

	ADOPTION OF LAW	I/M PROGRAM DEVELOPMENTAL PHASE	I/M PROGRAM START UP 12/31/81	I/M PROGRAM OPERATIONAL PHASE
		J F M A M J J A S O N D	J F M A M J J A S O N D	
<u>PUBLIC AWARENESS PLANNING PART A & B</u>				
A. COMMITMENT (To be accomplished soon after adoption).	X X			
1. Designate responsible agency	X			
2. Designate public awareness coordinator	X			
3. Designate plan development task force (optional).	X			
4. Determine need for consultants	X			
5. Determine funding sources	X			
B. IDENTIFICATION (To be completed NLT 4/30/81).	X X			
1. Identify target audience and develop mail list.	X			
2. Identify general message and style	X			
3. Identify available materials	X			
4. Determine materials still needed and develop materials	X			
5. Determine information techniques	X			
6. Determine implementation schedule	X			
7. Determine consumer response system	X			
<u>PUBLIC AWARENESS IMPLEMENTATION PART C, D & E</u>				
C. OUTREACH, INTERACTION AND RESPONSIVENESS (NLT 6 mos. prior to mandatory program start up).		X X X X X X X		→
1. Initiate and maintain outreach with constituents		X X X X X X X		
2. Initiate and maintain interaction with constituents		X X X X X X X		
3. Initiate consumer response system			X X	
D. EVALUATION AND MODIFICATION (As required)			X X	→
1. Evaluate effectiveness of the public awareness plan			X X	
2. Modify plan for deficiencies identified			X	
E. FEEDBACK AND PROGRESS REPORTING (As required).			X	→
1. Feedback to constituents			X	
2. Annual progress reports			X	

I/M PUBLIC AWARENESS
IMPLEMENTATION SCHEDULE - DECENTRALIZED PROGRAMS -- WORKSHEET

	ADOPTION OF LAW	DEVELOPMENTAL PHASE	I/M PROGRAM START UP 12/31/81	OPERATIONAL PHASE
	↓		↓	
PUBLIC AWARENESS PLANNING PART A & B	J	F M A M J J A S O N D	J	F M A M J J A S O N D
A. COMMITMENT (To be accomplished soon after adoption). 1. Designate responsible agency 2. Designate public awareness coordinator 3. Designate plan development task force (optional). 4. Determine need for consultants 5. Determine funding sources				
B. IDENTIFICATION (To be completed NLT 4/30/81). 1. Identify target audience and develop mail list. 2. Identify general message and style 3. Identify available materials 4. Determine materials still needed and develop materials 5. Determine information techniques 6. Determine implementation schedule 7. Determine consumer response system				
PUBLIC AWARENESS IMPLEMENTATION PART C, D, & E				
C. OUTREACH, INTERACTION AND RESPONSIVENESS (NLT 6 mos. prior to mandatory program start up). 1. Initiate and maintain outreach with constituents 2. Initiate and maintain interaction with constituents 3. Initiate consumer response system				
D. EVALUATION AND MODIFICATION (As required). 1. Evaluate effectiveness of the public awareness plan 2. Modify plan for deficiencies identified				
E. FEEDBACK AND PROGRESS REPORTING (As required). 1. Feedback to constituents 2. Annual progress reports				

OPERATIONAL PHASE

PUBLIC AWARENESS PLANNING PART A & B		J F M A M J J A S O N D	J F M A M J J A S O N D
<u>A. COMMITMENT</u> (To be accomplished soon after adoption).	X X		
1. Designate responsible agency	X		
2. Designate public awareness coordinator	X		
3. Designate plan development task force (optional).	X		
4. Determine need for consultants	X		
5. Determine funding sources	X		
<u>B. IDENTIFICATION</u> (To be completed NLT 4/30/82).	X X		
1. Identify target audience and develop mail list.	X		
2. Identify general message and style	X		
3. Identify available materials	X		
4. Determine materials still needed and develop materials	X		
5. Determine information techniques	X		
6. Determine implementation schedule	X		
7. Determine consumer response system	X		
<u>PUBLIC AWARENESS IMPLEMENTATION PART C, D & E</u>			
<u>C. OUTREACH, INTERACTION AND RESPONSIVENESS</u> (NLT 6 mos. prior to mandatory program start up).	X X X X X X X		
1. Initiate and maintain outreach with constituents	X X X X X X X		
2. Initiate and maintain interaction with constituents	X X X X X X X		
3. Initiate consumer response system	X X		
<u>D. EVALUATION AND MODIFICATION</u> (As required)	X X		
1. Evaluate effectiveness of the public awareness plan	X X		
2. Modify plan for deficiencies identified	X		
<u>E. FEEDBACK AND PROGRESS REPORTING</u> (As required).	X		
1. Feedback to constituents	X		
2. Annual progress reports	X		

	ADOPTION OF LAW	DEVELOPMENTAL PHASE	I/M PROGRAM START UP 12/31/82	OPERATIONAL PHASE
PUBLIC AWARENESS PLANNING PARR A & B	J	F M A M J J A S O N D	J	F M A M J J A S O N D
A. COMMITMENT (To be accomplished soon after adoption). 1. Designate responsible agency 2. Designate public awareness coordinator 3. Designate plan development task force (optional). 4. Determine need for consultants 5. Determine funding sources				
B. IDENTIFICATION (To be completed NLT 4/30/82). 1. Identify target audience and develop mail list. 2. Identify general message and style 3. Identify available materials 4. Determine materials still needed and develop materials 5. Determine information techniques 6. Determine implementation schedule 7. Determine consumer response system				
PUBLIC AWARENESS IMPLEMENTATION PART C,D & E				
C. OUTREACH, INTERACTION AND RESPONSIVENESS (NLT 6 mos. prior to mandatory program start up). 1. Initiate and maintain outreach with constituents 2. Initiate and maintain interaction with constituents 3. Initiate consumer response system				
D. EVALUATION AND MODIFICATION (As required). 1. Evaluate effectiveness of the public awareness plan 2. Modify plan for deficiencies identified				
E. FEEDBACK AND PROGRESS REPORTING (As required). 1. Feedback to constituents 2. Annual progress reports				

7. Determine type of consumer response system to adopt during the operation of the program. A mechanism to respond to public inquiries during the operational phase should be adopted. Several mechanisms which are being used in operating programs are proving to be effective. One is a "hotline" telephone system - the other is a "questionnaire" to motorists as they arrive at the inspection station. A list of frequently asked questions with answers could be compiled and made available to interested groups for inclusion in newsletters.

C. Outreach, Interaction and Responsiveness

Based on the two previous elements discussed, "commitment" and "identification", a developed public awareness plan should now be completed and ready for implementation.

Outreach should be initiated to all the identified target audiences addressing appropriate I/M messages and using several of the technique approaches mentioned earlier. Constituents can productively be informed about the I/M program only if they receive timely, accurate and understandable information well in advance of program start-up.

Interaction with affected constituents should follow the outreach effort. While outreach activities inform and stimulate public interest, interaction activities such as I/M emission demonstrations, channel this awareness and interest into exchanges among the affected constituents on program issues.

Response to public concerns should follow interaction activities. The responsible I/M official should respond in a timely manner to requests for information by the general public and make their concerns known to the appropriate agency officials. The consumer response system which has been decided - whether a "hotline", "questionnaire", or other should be implemented for use during the operational phase.

D. Evaluation and Modification

Evaluation should be accomplished to determine the effectiveness of the public awareness plan. The objectives of the awareness program have been accomplished when there is widespread public understanding of the air quality problem and the need for I/M. The responsible agency should define the goals, objectives and evaluation criteria of the public awareness plan at the outset of the process. These objectives and criteria should be used as the basis for periodically assessing the effectiveness of the program. EPA suggests that the responsible agency use the following criteria or questions to evaluate performance. This evaluation should at a minimum be conducted semi-annually or even more frequently depending upon the need.

1. Have clear goals, objectives and evaluation criteria of the I/M public awareness plan been defined? To what degree are they being met?
2. Have all potentially affected and interested segments of the public been identified and contacted regarding their role and concerns in the I/M development and implementation process?

3. Has timely information on the I/M rationale, the procedures, the benefits, etc. been provided to affected interests to allow for an understanding and intelligent comment on the program?
4. Have their concerns been communicated to and understood by the responsible agency's staff and decisionmakers? Have the staff and decisionmakers responded to these concerns?
5. Has there been an appropriate commitment of manpower and financial resources to the public awareness program -- including technical and financial assistance to citizen groups and/or citizen advisory bodies?
6. Have the media and other information techniques been effectively used, resulting in greater public understanding of the air quality problem and the effectiveness of I/M?
7. Have section 105/175 funds and other fundings sources been effectively used to educate, inform and involve the public and local elected officials?

Modification to the plan should be made on any deficiencies identified. Continuous evaluation of the plan for its effectiveness in accomplishing the I/M objectives is highly recommended.

E. Feedback and Progress Reporting

Feedback should be provided to affected constituents on the program's progress, as well as other program issues. For instance, motorists responses from a hotline or questionnaires are useful to determine public acceptance of I/M. Technical data on the emission reductions being realized can show the effectiveness of the program. This information will likely be provided by the responsible agency operating the program and should be disseminated through news releases, newsletters, leaflets, trade magazines and radio and/or television interviews and announcements. It's imperative that the public be kept informed about the effectiveness of the program so that they can appreciate the air quality and other benefits being realized as a result of their participation in the program, and thus support continuation of I/M.

Progress Reporting should be accomplished at least annually. The I/M Public Awareness Plan should be tracked and substantiated for this progress report. The responsible agency should summarize the public awareness activities accomplished to date, identify cost of projects, list dates of events and evaluate the success of these efforts. An outline of upcoming information activities should also be reported. These progress reports should be made available to the public in a timely well-publicized manner in convenient locations, to interested and affected constituencies through direct distribution, and to other governmental agencies concerned with I/M.

III. AppendicesA. I/M PA Samples:

1. I/M Leaflet
2. Public Survey Questionnaire
3. Fact Sheet
4. Press Release
5. Public Service Announcement (PSA)
6. I/M Demonstration Van Brochure
7. I/M Newsletter

B. I/M PA Reference:

1. List of EPA I/M audiovisuals and publications.
2. I/M Public Opinion Survey of Operating Programs
3. Table on public information of operating I/M programs - prepared by Radian Corporation - April 17, 1980

What Will It Cost You?

Most adjustments involve faults leading to CO emissions, and relatively minor and inexpensive. For example, nearly half the failing vehicles in New Jersey in 1976-77 required only a carburetor adjustment at \$10 or less. 1/3 needed a minor tuneup, between \$13 and \$40. About 16% needed major work, at \$30 to \$100.

Rhode Island Emission Standards

Motor vehicles with emissions greater than the limits below will be failed:

Year of Manufacture	HC ppm	CO%
1967 or earlier	1600	10
1968-69	800	8
1970-74	600	6
1975 and after	300	3

These initial standards may be revised in time; New Jersey, first to launch I/M, has lowered permissible emissions limits.

If you have a question - or suggestion -
call the Information Center

331-7664

or Department of Transportation

277-2983

Produced by

Rhode Island Lung Association



in cooperation with

**R.I. Department of
Environmental Management**



and

R.I. Department of Transportation



**What You'll Want to
Know About
Inspection /
Maintenance
For Your Car**



How Serious Is Our Air Pollution?

Rhode Island's motor vehicles are the source of 90% of our carbon monoxide (CO), and 75% of our hydrocarbons (HC). These interact with other pollutants and form photochemical oxidants or "smog".

Federal standards for CO, set to protect public health, were violated in Rhode Island 34 times in 1977. For oxidants - smog - they were exceeded 429 times, sometimes at levels double the standard.

Serious Health Problems Can Arise At Levels Only Slightly Above Federal Standards

CO is an invisible, odorless gas, which causes oxygen starvation in the system, leading to headache, nausea, and drowsiness. People with coronary problems are most vulnerable.

At levels only slightly above the standard for oxidants there may be eye, nose, and throat irritation and chest pain in healthy adults. At these levels, recorded in Rhode Island, there may be breathing problems for asthma and bronchitis patients. As levels increase, some acute respiratory symptoms have been noted in exercising young people, along with impaired athletic performance in young adults.

The threats to health increase as pollution levels rise, the number of exposures multiplies, and exposure time is lengthened.

I/M for Pollution Is Now Part of Your Regular Rhode Island Auto Inspection

To reduce automobile pollution and its threat to public health, our General Assembly passed the law making annual Inspection/Maintenance mandatory.

An introductory period in which only inspection was required ends January 1, 1979. Thereafter, owners whose cars fail emissions tests must have the adjustments made, at their own expense, to bring their vehicles into conformance with tailpipe emissions standards.

How I/M Works

Some 800 service stations are licensed by the Department of Transportation to perform the emissions and safety tests at a cost of \$4. Passing vehicles will have a sticker applied.

Owners of failed vehicles will get a written report. They may make their own repairs, or go to a station of their choice, but must return to the original test station or pay a second \$4 fee for retesting at another station to get a sticker. Owners are allowed 14 days for repairs and retesting, with a possible penalty of loss of plates for tardiness.

Consumer Protection

It begins at the testing station, where the testers employed must have attended the State-approved training program. The station must have a State-approved emission analyzer, and a supply of calibration gases, a mixture of known concentrations used to ensure exact performance of the analyzer.

You Can Challenge Test Results

Further public protection centers at The Challenge Station at 1310 Pontiac Ave., Cranston. This State-run facility will operate 7:30 a.m. to 3:30 p.m. Monday-Friday. Owners who question results of the initial test may have them verified here free of charge, by appointment. If the state mechanics find the car in compliance, they will approve it with a written report. However, the owner must return to the original test station for the sticker, or go to another private station, at an additional \$4 cost, for the sticker.

I/M Makes \$ and Sense

Reduced pollution means reduced suffering from heart, circulatory and lung disorders. Less pollution means less aggravation of asthma, bronchitis, and allergies. Costs of medical treatment and absenteeism can be reduced.

Improved fuel economy in adjusted vehicles may go as high as 4% - a savings of about 40 gallons annually. Optimum savings and performance result when the car is maintained according to manufacturer's specifications.

As many as 400 new service station jobs may be created for Rhode Islanders.

Owners Are Responsible for the Condition of Their Own Cars

Under I/M, pollution cleanup costs do not fall on the owner of a clean car. The non-polluting driver may also be helping to forestall government imposition of more drastic measures. These can include gas rationing, parking taxes and bans, and curtailed city driving.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ANN ARBOR, MICHIGAN 48105

OFFICE OF
AIR, NOISE AND RADIATIONSample I/M Questionnaire for Assessing Public Attitudes

1. Do you think air pollution is:

A very serious problem _____
Somewhat of a problem _____
Not much of a problem _____
Not a problem at all _____

2. What do you think is the major cause of air pollution?

Vehicles _____
Industry _____
Airplanes _____
Smoking _____
Fires _____
Dust _____

3. How much do you think air pollution hurts people's health?

Very much _____
Somewhat _____
Not very much _____
Not at all _____

4. What effect do you think a motor tune-up has on air pollution?

A great effect _____
A helpful effect _____
A slight effect _____
No effect at all _____

5. How often do you have your car tuned?

Three times a year _____
Twice a year _____
Once a year _____
Less than once a year _____

6. Are you aware that your car's exhaust emissions will soon be required to be tested for air pollution?

Yes _____
No _____

SAMPLE A-2
I/M QUESTIONNAIRE



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ANN ARBOR, MICHIGAN 48105

FACT SHEET
INSPECTION/MAINTENANCE PROGRAMS

OFFICE OF
AIR, NOISE AND RADIATIONIntroduction

Improved air quality has been a much sought-after goal in the United States for the last three decades. Although efforts to reduce air pollution levels were initiated in the 1950's and increased during the 1960's, it was not until 1970 that there was strong national legislation in the form of the Clean Air Act. Amendments to the Act passed by Congress in 1977 greatly increased the air pollution control efforts required by States and communities, and set new deadlines to achieve national air quality levels to ensure adequate protection of the public health and welfare.

The costs of damages from air pollution are extensive in this country. In health alone, costs are estimated to be over \$10 billion a year. As required by law, the Environmental Protection Agency (EPA) identified the major air pollutants which are harmful to the public health and welfare. In 1971 standards were set which established limits for the concentrations of these pollutants which can be in the air and still protect the public with an adequate margin of safety.

Automobiles are major sources of two of the most pervasive of these air pollutants -- carbon monoxide and hydrocarbons. Both are produced by the incomplete burning of fuels. Carbon monoxide is harmful because it reduces the oxygen available to the brain and body cells and puts an extra burden on the heart and lungs. Hydrocarbons themselves are generally not harmful, but they react with another pollutant, nitrogen oxides, in sunlight to create smog. The main constituent of smog, ozone, is a severe irritant to all mucous membranes and its main health effects are on the respiratory system.

The Clean Air Act Amendments of 1977 call for certain control measures in urban and other areas where problems with these pollutants are severe and where the health-related standards will not be achieved by the 1982 deadline set by Congress. One particular control measure is emissions inspection and maintenance of motor vehicles. Since such programs will affect a broad segment of the public, this fact sheet has been developed to answer some of the most frequently-asked questions.

What is Inspection and Maintenance?

Inspection and Maintenance (I/M) is a program designed to ensure the in-use effectiveness of the emission control systems that have been built into American and foreign automobiles. Emission control systems have been required for all automobiles operated in the United States since 1968, and the effectiveness of such controls must be certified by EPA in all new cars before they can be marketed.

Why is I/M Needed?

Automobiles emit major polluting gases which are harmful to the public health. Although auto manufacturers have been required to meet increasingly stringent new car emission standards, autos still need maintenance. Tests

have shown that in-use vehicles emit pollutants in amounts that exceed their certified levels. Sixty percent of one-year cars are found to exceed new car emission standards. The primary causes of the high emission levels are maladjustments and inadequate vehicle maintenance.

How does I/M Work?

I/M requires periodic inspection of in-use vehicles and emission-related repair for those cars which fail to meet prescribed inspection standards. The motorist brings his or her car to an inspection facility where a probe is inserted into the tailpipe to measure the hydrocarbon (HC) and carbon monoxide (CO) emissions. The entire inspection process takes only a few minutes. If the emissions are above the standards, the car fails and the motorist is told of the probable causes. He or she must then have the car repaired and return it for re-inspection.

Where are such inspections performed?

Inspections may be performed by the State or local municipal authority at inspection stations (known as centralized programs) or by licensed service stations and garages (decentralized programs). Repair is done at the motorist's choice of repair facilities but in a decentralized program repairs can be done at the licensed garage. Usually, successful completion of the I/M test is necessary for renewal of auto registration or a required inspection sticker.

Do I/M programs exist now?

Yes. I/M is working in many areas of the country, with more programs scheduled to begin. There are programs in Arizona, California, Nevada, New Jersey, Ohio, Oregon and Rhode Island.

Does the public accept I/M?

Yes. Public opinion surveys in four states with operating I/M programs found that a majority of those polled responded favorably towards I/M programs. For example, of 600 residents polled in Arizona (Maricopa and Pima Counties), 58% favored retention of the existing I/M program because they felt air pollution is a serious health problem; in the California South Coast Air Basin, more than 67% of 600 residents polled favored annual auto emission inspections; random distribution of 3,245 questionnaires to New Jersey motorists as they arrived at the inspection station found 83% favoring continuation of the I/M program; and in Rhode Island, 85% of the participants considered the I/M program to be important.

If I/M is required by law in the dirty areas of the country, won't that put an added tax burden on people who live there?

No, because I/M programs can be self-sustaining. In a centralized program (inspection station), a State or community can run an I/M system themselves or can allow a private contractor to build and operate the facilities. In the latter case the contractor, not the State or local government, is responsible for the necessary capital investment. Initial and continuing operating costs are recovered by fees. In a decentralized system, existing garages would pay

for necessary equipment and operating costs through a fee charged to the motorist.

How much does an inspection cost?

Inspection fees for existing I/M programs range from \$2.50 to \$11.00 with \$5.00 the most typical fee. These fees cover all the costs of the program, including the cost of administration, operation, and enforcement.

How much do repairs cost?

The range of average cost of repairs in states with operating I/M programs is \$18-\$35 for that minority (15-30%) of cars that do require repair. Data from the New Jersey and Arizona I/M programs, which have been in existence the longest, indicate average repairs of \$18 and \$29 respectively. The majority of cars required only minor tune-up work to pass the inspection test. The most common repairs were carburetor adjustments, spark plug replacement, choke adjustments, air filter replacement and idle speed adjustment. Some, but infrequent, higher-cost parts and repairs were needed. In a recent EPA study in Portland, Oregon repairs averaged \$29 with about 50 percent of the vehicles sampled having maintenance costs of \$14 or less and 90 percent having costs of \$70 or less.

Won't I/M cost people with older cars a lot more?

No. Older cars are not expected to meet the same standards as newer models with sophisticated emission controls. The pass/fail standards for each model year are normally set to be within the design capability of the automobile. In addition, cost limits on repairs may be set to avoid penalizing those driving older cars which might require more expensive repairs such as ring or valve jobs. For example, cost limits have been set in California and Arizona.

Is I/M really proving effect in reducing emissions?

Yes. Results show that tailpipe emissions from vehicles undergoing repair are reduced by 42 percent for hydrocarbons and 47 percent for carbon monoxide. For the fleet as a whole, including the majority of vehicles which passes the inspection and requires no repair, emissions were reduced by 20 percent for hydrocarbons and 36 percent for carbon monoxide.

Is I/M proving effect in improving air quality?

Yes. New Jersey, which has the oldest program, recently studied their carbon monoxide data and found that I/M and the increasingly stringent new car emission standards are together responsible for a 28 percent decrease in carbon monoxide levels. University of Wisconsin statisticians examining the data found that the improvement in air quality occurred independently of year-to-year weather patterns and at a time when traffic volume was increasing.

Currently, there are no studies that quantify the effects of I/M on ozone levels. Ozone reductions are more difficult to measure because of topography, meteorology, pollutant transport factors and the impact of stationary hydro-

carbon sources. Determining the impact of I/M in concert with other hydrocarbon control strategies will necessitate more time for collecting ozone data. However, hydrocarbon reductions have been linked to ozone reductions over many years in the Los Angeles area. Because it has been shown that it reduces hydrocarbon emissions from automobiles, I/M is an effective ozone control strategy.

Identified causes of high levels of hydrocarbon and carbon monoxide emissions from in-use vehicles are maladjustments and lack of vehicle maintenance. A recent U.S. General Accounting Office report endorses I/M as the strategy needed to correct this problem.

With an energy shortage possible, does I/M help fuel economy?

Yes. Various studies show that there is a potential for 3 to 4 percent improvement in fuel economy when maintenance is performed according to the manufacturer's specifications. EPA's study of the Oregon I/M program has indicated that there is no significant fuel economy being realized, but it is believed that the lack of training specific to proper emission control maintenance is the cause.

If the new cars are warranted, will I have to pay for repairs if I fail the inspection test?

Probably not. The Clean Air Act provides for a five year or 50,000 mile warranty for defects in material or workmanship on any part, device, or component that is designed for emission control. In addition, for 1981 and later model year cars, an emissions performance warranty requires the manufacturer to repair at no cost to the owner, a car failing an inspection test, provided it can be shown that the car has received proper maintenance. This warranty applies for two years or 24,000 miles on all components which affect emission levels and extends to 50,000 miles for those components strictly related to emission control (e.g. catalytic converters). It should be noted, however, that some failures in an inspection program are due to lack of proper maintenance or to improper adjustments, and as such the warranty does not apply in these cases.

Will I/M continue to be an effective control strategy in the face of future more stringent new car standards?

Yes, although the more stringent standards which will be implemented in 1980 and 1981 will substantially reduce the low-mileage emissions of new vehicles, these reductions will not be realized throughout the life of the vehicle unless the car is properly maintained and the emission control system remains functional. Therefore I/M will serve a continuing need, even as absolute levels of new vehicle emissions are reduced, by encouraging motorists to maintain their vehicles.

Inspection/maintenance can also serve as a deterrent to misfueling and tampering. Use of the catalytic converter as the key element in many manufacturers' future emission control systems will necessitate the continued use of lead-free gasoline. Improper fueling with leaded gasoline can cause catalyst damage and greatly increase emissions.

United States
Environmental Protection
Agency

Mobile Source
Air Pollution Control
2565 Plymouth Road
Ann Arbor MI 48106



Environmental News

FOR IMMEDIATE RELEASE
Tuesday, April 1, 1980

Mat Simoncini
(313) 668-4223

AUTO EMISSION CONTROL AND INSPECTION PROGRAMS

Automobiles are major sources of two of the most pervasive air pollutants: carbon monoxide (CO) and hydrocarbons (HC). Although auto manufacturers have been required to meet increasingly stringent new car emission standards, automobiles still need maintenance. Tests have shown that cars emit the CO and HC pollutants in amounts that exceed their certified levels. Sixty percent of one-year old cars are found to exceed new car emission standards. The primary causes of the high emission levels are maladjustments and inadequate vehicle maintenance.

Auto inspection programs are designed to ensure the effectiveness of the air emission control systems that have been built into American and foreign automobiles. Emission control systems have been required for all automobiles operated in the United States since 1968, and the effectiveness of such controls must be certified by EPA in all new cars before they can be marketed.

(more)

SAMPLE - A-4
I/M PRESS RELEASE

The Clean Air Act Amendments specify that auto emission inspection and maintenance programs must be implemented by many urban areas with serious auto pollution problems. The law states that any urban areas receiving an extension beyond 1982 to meet the clean-up deadlines must have a program in full operation no later than 1982. This means that major urban areas over 200,000 populations must move expeditiously to set up inspection and maintenance programs.

The EPA identified urban areas in 29 states that will need auto I/M programs to meet the health related air quality standards. Twenty-four of these states now have programs or have authority. The remaining 5 states are still seeking legal authority. However, the requirement that such auto I/M programs will be in operation by 1982 necessitates quick action.

Evidence from existing programs in New Jersey, Arizona, Portland and Nevada, indicates that annual inspection minimizes costs and maximizes public acceptance while maintaining a high level of emission reduction.

--- end ---

SAMPLE PUBLIC SERVICE ANNOUNCEMENT
for use by Radio or Television

(Originating Office/Agency Name
and Address Here)

(Date)
(Name)
(Phone)

FOR BROADCAST BEFORE
MIDNIGHT, (Date)

PUBLIC SERVICE ANNOUNCEMENT - 30 SECONDS

If you drive a poorly tuned car you're fighting a losing battle. You're losing money because your car is using more gas than it should and you're losing clean air because cars, especially poorly tuned cars, are one of our biggest causes of air pollution. Do yourself a favor keep your car running right. We all need clean air.

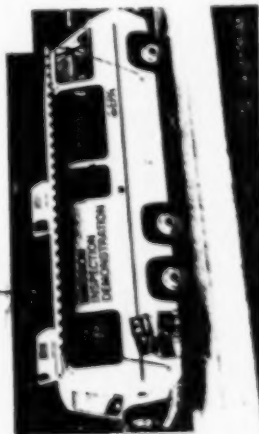
--- end ---

SAMPLE - A-5
I/M PSA

Environmental Protection Agency
Ann Arbor, Michigan 48105
Official Business

Emission Inspection Demonstration

This demonstration is being conducted to introduce you to automobile inspection/ maintenance (I/M). I/M is a program in which motor vehicles are periodically inspected and those with high emission levels maintained or repaired.



United States
Environmental
Protection Agency

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EPA 325



The Auto and Your Health

Your car is part of an urgent health problem—air pollution. In 1978 104 out of 105 major urban areas in America violated one or more of the health related air quality standards. Autos are the major contributor to unhealthy air. Although your car has emission control equipment designed for low pollution levels, the benefits of these emission controls are often not realized due to lack of or improper maintenance.

The Automotive Pollutants

Cars emit three major polluting gases—hydrocarbons (HC), carbon monoxide (CO), and nitrogen oxides (NOx). CO is a colorless, odorless, poisonous gas produced by the incomplete burning of fuels. CO reduces the oxygen available to the brain and body cells, in particular the heart and lungs. Hydrocarbons and nitrogen oxides react together in the presence of sunlight to form photochemical smog. Ozone, the main constituent of smog, causes irritation to the eyes and mucous membranes and aggravates respiratory illness.

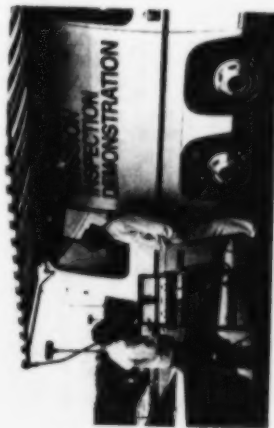
High levels of these automotive pollutants in the air affect all of us and can be especially bad for children, the aged, and those with respiratory and heart ailments. For this reason Congress authorized EPA to set air quality standards which protect the public health.

The Clean Air Act

In the Clean Air Act Amendments of 1977, Congress singled out inspection/maintenance (I/M) as a unique and cost-effective strategy for reducing the levels of automobile related pollutants. Urban areas which will not be able to meet the air quality standards by 1982 must begin I/M programs. Thirty states will be beginning programs in the next few years.

Keeping Your Car Clean

There are several reasons for excessive automobile pollution:



Lack of Maintenance

Many owners simply do not give their cars proper, routine maintenance.

Tampering

Some owners deliberately disable the emission control systems on their cars.

Fuel Switching

Some owners deliberately or inadvertently poison the catalytic converter used on many cars by using leaded instead of unleaded gas.

Inspection Process

The test for excess pollutants is performed by placing the probe of an analyzer into the car's exhaust pipe. The analyzer measures the hydrocarbon and carbon monoxide emissions while the car is idling.

In a real I/M program, you would probably receive the notice of the required test in the mail along with your annual registration materials. You would then bring your car to an official inspection station. The station might be operated by the state or it might be a garage or repair facility in your neighborhood which has been specifically licensed to conduct inspections. At the station your car's emission levels are measured and compared to the standards for cars the same age. The whole testing process takes about five minutes.

Cars which fail to meet the pollution standards must be repaired and returned for a second test. Normally the needed repairs are simple adjustments. In existing I/M programs, most repairs have cost \$15.00 or less.

What Your Car Needs

If an exhaust analyzer shows high carbon monoxide it may mean—

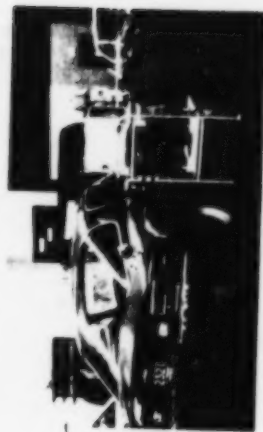
- dirty air filter
- clogged PCV system
- partially closed choke
- incorrect carburetor adjustment
- poorly adjusted timing
- malfunctioning thermostatic air control

If the analyzer shows high hydrocarbons it may mean—

- fouled spark plugs
- faulty spark plug wires or distributor cap
- ignition points improperly set
- ignition timing incorrect
- incorrect carburetor adjustment
- vacuum leak

Motor Vehicle Emission Laboratory

The Motor Vehicle Emission Laboratory in Ann Arbor, Michigan is part of EPA's Office of Mobile Source Air Pollution Control. This office is responsible for reducing the levels of harmful pollutants emitted by motor vehicles. Every year the new car designs are certified by EPA before they can be sold. Another part of the job of reducing automotive pollution is ensuring that cars in actual use are as clean as they are designed to be. I/M is an effective program for finding gross polluters and making sure that they are fixed. EPA personnel from Ann Arbor are working closely with state and local officials to implement I/M where it is needed.





I/M

NEWS

Metropolitan Washington Council of Governments

September, 1979

No.1

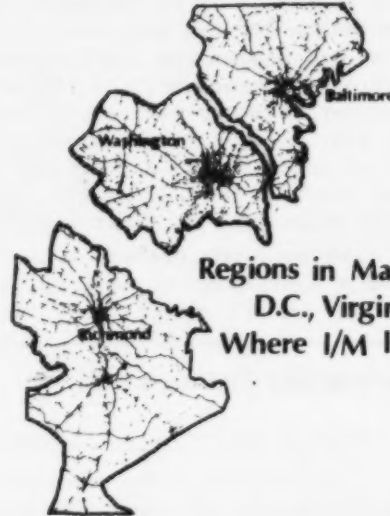
Why A Newsletter on Inspection/Maintenance?

Within the next two to three years, car owners in the Washington and Baltimore metropolitan areas will be required to have their vehicles "inspected" for pollutant emissions and, if necessary, "maintained" to bring the vehicle within standards.

"I/M," sometimes called Vehicle Emissions I/M or VEIM, will affect a large group of people and interests: the entire auto driving public, as well as the businesses that manufacture, sell and repair automobiles. Because of this, the decisions that go into designing and carrying out a successful I/M program are difficult ones. Decisions have to be made on such things as the kind of facility that will conduct vehicle checkups, the kind of testing equipment used and how it is calibrated, the emissions standards expected of different aged cars, the kind of maintenance repairs required and their costs, and the compatibility of multi-state programs in areas like metropolitan Washington. These decisions will determine whether the I/M programs are fair, reliable, inexpensive, and accepted by the public.

The purpose of this newsletter is to distribute current information on the various aspects of I/M, and thereby enable public officials, affected businesses and the public at large to make an informed assessment of the program.

continued on p. 2



Regions in Maryland,
D.C., Virginia
Where I/M Is Required

Clean Air and the Role of Emissions I/M

Federal air pollution legislation enacted since 1968 has focused heavily on the problem of automobile tailpipe emissions. This is because autos represent a major source of harmful pollutants in many of the larger urban areas. Two of the most troublesome pollutants prevalent in U.S. cities--photochemical oxidants and carbon monoxide--stem largely from motor vehicles. In 1976, an estimated 90 percent of the carbon monoxide present in the air around the Washington Metropolitan area came from vehicle emissions.

Photochemical oxidants (principally ozone, formed by a combination of hydrocarbons and nitrogen oxides in the presence of sunlight) create what is called "smog". Humans are affected by high concentrations of these pollutants, often experiencing irritations of mucous membranes of the lungs and other respiratory organs. Carbon monoxide limits the blood's oxygen-carrying capacity and at high concentrations, can impair the body's central nervous system.

SAMPLE - A-7
cont I/M NEWSLETTER

In this Issue:

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Calendar of I/M Events.....	p. 5
I/M Around the Country.....	p. 6
On the Local Front.....	p. 7
Health Effects.....	p. 8

"(Vehicle emissions) inspection programs offer a comprehensive way to identify and correct maintenance and other emissions problems. . . (I/M) programs are the answer."

U.S. General Accounting Office, January 1979

Why A Newsletter ?

To accomplish this, each issue of I/M NEWS will examine the status of current legislation in Virginia, Maryland and the District of Columbia; summarize important federal and state actions on I/M; and assess how I/M programs are faring in other parts of the country. Regular features will cover such things as test equipment evaluations, the status of local mechanic training courses, and what is known about the impact of auto emissions on public health.

We hope our readers will find I/M NEWS a useful way to keep up to date on I/M and how it affects you. We urge you

continued from page 1

to let us know if our coverage could be better on certain topics, or your views on the I/M program proposed for your state. Letters to the editor will appear in a regular feature called Reader's Forum. Also write us if you know an individual or organization which would be interested in receiving the newsletter or to correct an address.

Write to: I/M NEWS

c/o Metropolitan Washington
Council of Governments
1875 Eye Street, N.W.
Washington, D.C. 20006

Clean Air and Emissions I/M

continued from page 1

A Shift in Anti-Pollution Legislation

Since 1968, efforts by the U.S. Environmental Protection Agency (EPA) to control auto emissions have focused entirely on new cars: requiring auto makers to reduce exhaust emissions to more stringent levels each year. Recent data, however, indicates that emissions from new cars are only part of the problem. 100 million cars now on the road fail to meet the emission standards for which they were certified and built. More than half of the cars built and tested since 1974 exceed Federal standards within one year after first sale, and the emissions continue to increase as the car gets older.

Thus, despite the progress made in controlling new car emissions, improper engine adjustments and neglected maintenance appear to account for most of the high polluters on the road today. See Table 1.

The Federal response to this situation is a new emphasis on improving car engine maintenance as well as continuing to require manufacture of cleaner engines. In the Clean Air Act Amendments of 1977, Congress mandated vehicle emissions "inspection and maintenance" (I/M) as a major pollution reduction mechanism.

continued

Table 1. Causes of Emission Violations
(by percent of total recorded failures)

Maladjusted engine settings.....	47%
Deterioration due to premature parts failure and illegal use of leaded fuels....	25%
Tampering (i.e. removing or rendering emissions controls inoperable.....)	18%
Inadequate engine maintenance...	7%
Manufacture design and poor production practices.....	3%

Source: U.S. EPA



I/M

This newsletter was prepared by the Metropolitan Washington Council of Governments in cooperation with the Maryland State Department of Transportation, the Regional Planning Council of Baltimore, and the Maryland State Department of Health and Mental Hygiene.

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Articles from I/M NEWS may be reprinted without permission.

Staff

Caroline Freeman
Nancy Schmitz
Robert Magill

"...substantial data has been generated demonstrating I/M's potential effectiveness... (and) practicality."

Michael P. Walsh, EPA Deputy Administrator
for Mobile Source Air Pollution Control

Clean Air Act Requirements

Under Sections 172(b)(7) and (10) of the Clean Air Act Amendments, I/M programs are required in those urban areas for which a state is unable to demonstrate attainment of ozone or carbon monoxide standards by December 31, 1982. If the state established a schedule for I/M implementation, attainment deadlines may be extended to no later than December 31, 1987. Currently, 31 states, encompassing over 40 "nonattainment" areas across the country, must comply with the I/M requirement. These states must show EPA that adequate authority to implement I/M exists, and then follow Federal deadlines to initiate I/M programs. To establish this authority, states must enact enabling legislation and appropriately revise their State Implementation Plans (SIPs).

The penalty for failure of a non-attainment area to establish I/M by the required deadline is mandated by law and can consist of denial of Federal highway, sewer and air quality grants. However, EPA has committed itself to work closely with the states to facilitate I/M imple-

mentation and to obviate the need to impose sanctions.

Federal Deadlines

The 1977 Clean Air Act Amendments and related regulations set the following deadlines for establishing I/M programs in nonattainment areas:

- June 30, 1979 - Enabling legislation authorizing I/M implementation must be enacted by the state. This date can be extended to June 30, 1980 for those states whose legislative calendars do not provide enough time for passage.
- December 31, 1981 - Implementation of "decentralized" I/M programs (franchised or licensed private garages.)
- December 31, 1982 - Implementation of "centralized" I/M programs (state-run or contractor-run).

Legislative

Update

Regional

I/M In Virginia, D.C., and Maryland

Over the next year and a half, elected officials and technical personnel from the transportation and environmental health agencies of Maryland, Virginia, and the District of Columbia will decide how to implement I/M programs in areas that continue to exceed CO and ozone standards. Public hearings are being scheduled and rigorous legislative debate is expected. This is the first report of a regular feature that will report on the status of I/M program development.

Maryland

The 1979 Maryland General Assembly enacted enabling legislation (S.B.751) authorizing state agencies to develop and implement a motor vehicle emissions inspections program in both the Balti-

more Metropolitan area and the Maryland portion of the metropolitan Washington area.

The legislation calls for a voluntary program to begin by January 1, 1981 and a mandatory program to begin by January 1, 1982 (see calendar, p. 5). Registered vehicles in the affected area would be inspected annually for emissions. An inspection fee is tentatively set at a maximum of \$7.00, which would cover one reinspection of vehicles failing an initial test.

S.B. 751 names the Motor Vehicle Administration in the Maryland Department of Transportation as the lead agency. The law designates the Maryland Department of Health and Mental Hygiene as the agency responsible for setting emissions standards.

S.B. 751 permits the state to hire a private contractor to conduct the

"From the public perspective, the inspection of motor vehicles is essential if the fuel economy, safety and emission control values built into new cars are not to be lost, compromised or defeated through consumer use."

--Joan Claybrook, Administrator
National Highway Traffic Safety Administration

state's emissions inspections, provided this system is determined to be more cost-effective and efficient than other alternatives.

State officials will be soliciting the public's views on the alternative inspection systems at public meetings and workshops to be held this fall.

Maryland's Governor Hughes and the Secretaries of Transportation and Health and Mental Hygiene are strongly committed to meeting the legislative requirements and to developing a program that includes many opportunities for citizen involvement. State officials intend to gear the inspection system to optimal consumer convenience and protection.

The state's commitment to a vehicle emissions inspection program was included in Maryland's revised State Implementation Plan (SIP) to meet National Ambient Air Quality Standards. The revised SIP was submitted to EPA in January for consideration.

Virginia

There were originally four urban nonattainment areas requiring I/M in the Commonwealth. However, I/M is now required only in the Richmond and Northern Virginia (Metro Washington) areas. A State Air Pollution Study Commission was formed in the summer of 1978 under Senate Joint Resolution No. 37 and has since studied possible I/M program options suitable to those areas of Virginia.

The State Air Pollution Control Board sponsored public hearings on I/M last August in the four original nonattainment areas. Enabling legislation was then introduced before the General Assembly. In November, however, Governor Dalton requested EPA to grant a one-year extension of the June, 1979 legislative deadline. The Governor contended the short 1979 State Legislative Session (30 days) precluded passage of any legislation. EPA agreed to the extension, but made approval contingent on the General Assembly's adoption of a joint resolution confirming Virginia's commitment to enact such legislation in the 1980 session.

STATUS OF I/M

JURISDICTION	LEGISLATION	SCHEDULE	VEHICLES AFFECTED	FREQUENCY OF INSPECTION	PROPOSED INSPECTION FEE	APPARENT PREFERRED FACILITY	TEST METHOD TO BE USED
MARYLAND	ENABLING LEGISLATION PASSED 5/29/79 MARYLAND SENATE BILL NO. 751.	JANUARY 1, 1981 FOR VOLUNTARY JANUARY 1, 1982 FOR MANDATORY PROGRAM	CARS, LIGHT DUTY TRUCKS UNDER 10,000 LBS.	ANNUAL	\$7.00 MAX. INCLUDING ONE REINSPECTION	INDEPENDENT CENTRALIZED CONTRACTOR	YET TO BE DETERMINED.
VIRGINIA	DRAFT LEGISLATION PLANNED FOR 1980 GENERAL ASSEMBLY ACTION	NOT LATER THAN JANUARY 1, 1982	LIGHT DUTY VEHICLES UNDER 7,500 LBS.	ANNUAL	\$4.00	STATE-CERTIFIED, FRANCHISED GARAGES AS PART OF REGULAR SAFETY INSPECTION.	IDLE MODE
DISTRICT OF COLUMBIA	ENABLING LEGISLATION PASSED 4/26/77 DC LAW 1- 132	NOW CONTINGENT ON EQUIVALENT I/M ACTIONS BY MD. AND VA.	CARS, LIGHT DUTY TRUCKS UNDER 6,000 LBS.	ANNUAL	YET TO BE DETERMINED	CENTRALIZED CITY-RUN PROGRAM; PART OF REGULAR SAFETY INSPECTION.	IDLE MODE

Senate Joint Resolution No. 118 fulfilled this requirement. It extends the Study Commission's terms through December 1, 1979, at which time the commissioners will report their findings to the Governor and the General Assembly and recommend specific I/M legislation.

The Study Commission and the Air Pollution Control Board have been moving with increasing momentum to outline the details of the state's I/M program. The Board has decided to ask EPA to exempt the Richmond area from an I/M requirement on the grounds that accelerated stationary control measures will bring the area within the 1982 attainment deadline without I/M. Draft I/M legislation for Northern Virginia is being prepared.

Thus far, there seems to be a consensus favoring the franchise garage approach. I/M inspections would be coordinated with the state's existing semi-annual motor vehicle inspection system, but I/M would be required only annually. According to the draft legislation, the Virginia State Police would have the lead responsibility for developing the

program. A \$50.00 maximum on maintenance repairs required for vehicles to meet inspection standards is also under consideration.

District of Columbia

The D.C. City Council enacted D.C. Law 1-132, "The District of Columbia Exhaust Emission Standards Act," in May, 1977. The legislation authorized annual emissions inspection for all registered vehicles weighing less than 6,000 pounds, to be performed at the District's existing official Vehicle Safety Inspection Stations. As is the case for safety inspections, emissions I/M will apply to both U.S. Government and diplomatic vehicles.

An idle test procedure is specified and maximum allowable emissions are scaled according to the age of the vehicle. The law sets the following emissions standards (see page 6), which are subject to amendment by the Director of the D.C. Department of Transportation (DOT).

REGIONAL I/M CALENDAR

As I/M implementation deadlines approach, there will be many I/M-related activities in the region: hearings for public comments and debate, workshops, and benchmark legislative decisions. I/M NEWS will continually report upcoming events of interest. Please report any I/M-related activities your organization would like included in future newsletter calendars.

MARYLAND

- SEPT. 4, 1979 -- REGIONAL PUBLIC MEETING - MARYLAND PORTION, WASHINGTON METROPOLITAN REGION
PLACE: MARYLAND NATIONAL CAPITAL PARKS & PLANNING COMMISSION AUDITORIUM
TIME: 7:30 P.M.
- SEPT. 5, -- REGIONAL PUBLIC MEETING - BALTIMORE
PLACE: POLY-WESTERN HIGH SCHOOL AUDITORIUM
1400 W. GOLDSPRING LANE, BALTIMORE
TIME: 7:30 P.M.
- SEPT. 21 -- PROPOSED RULES AND REGULATIONS ESTABLISHING I/M TO BE PUBLISHED IN MARYLAND REGISTER.
-- STATE TO RELEASE "REQUEST FOR COMMENT" TO SOLICIT PROSPECTIVE PROPOSALS FROM CONTRACTORS FOR I/M SYSTEMS.
- NOV. -- PUBLIC WORKSHOPS TO BE HELD IN EACH AFFECTED MARYLAND JURISDICTION ON I/M PROGRAM DETAILS.
- EARLY DEC., 1979 -- REVISED REGULATIONS TO BE PUBLISHED IN MARYLAND REGISTER.
- JAN. 1, 1980 -- REQUEST FOR PROPOSAL TO BE RELEASED FOR INSPECTION SYSTEM CONTRACT BIDS.
- JANUARY -- EXPANDED OPEN REGIONAL AIR QUALITY TASK FORCE (RAFT) ON PROPOSED REGULATIONS - FOLLOWED BY PREPARATION AND DISTRIBUTION OF RESPONSIVENESS SUMMARY.
- MAR. 1 -- INSPECTION SYSTEM CONTRACT TO BE RELEASED.
- APR. 1 -- FINAL DATE FOR STATE LEGISLATURE'S REVIEW OF I/M RULES AND REGULATIONS.
- JAN-SEPT. -- MECHANICS TRAINING WORKSHOPS ON EMISSIONS INSPECTION AND REPAIRS TO BE CONDUCTED.
- MAY 1 -- INSPECTION SYSTEM CONTRACT TO BE SIGNED.
- SEPT. 1 -- LICENSING/CERTIFICATION OF INSPECTION SITES TO BE COMPLETED.
- JAN. 1, 1981 -- VOLUNTARY I/M PROGRAM TO BE INITIATED.

VIRGINIA

- SEPT. 13, 1979 -- PUBLIC HEARING ON STATE AIR POLLUTION CONTROL BOARD'S PLAN TO ELIMINATE NEED FOR I/M IN RICHMOND AREA.
PLACE: CAPITOL BUILDING, ROOM 1, RICHMOND
TIME: 10:00 A.M.
- NOV. 16, -- PUBLIC HEARING TO BE HELD IN NORTHERN VIRGINIA ON DRAFT I/M LEGISLATION.
LOCATION AND TIME TO BE ANNOUNCED.
- 1980 -- ENABLING I/M LEGISLATION TO BE SUBMITTED TO VIRGINIA GENERAL ASSEMBLY.

DISTRICT OF COLUMBIA

- OCT., 1979 -- D.C. EXECUTIVE BRANCH TO SUBMIT AMENDMENTS TO D.C. LAW 1-132 TO CITY COUNCIL.
- SEPT.-JAN., 1979/80 -- D.C. DEPT. OF TRANSPORTATION TO DEVELOP I/M PROGRAM, INCLUDING MECHANICS TRAINING AND PUBLIC INFORMATION ACTIVITIES.
- JULY -- D.C. DEPT. OF TRANSPORTATION TO FINALIZE NECESSARY REGULATIONS ON I/M.
- JULY-DEC., 1980 -- FIRST PHASE OF I/M TO BE INITIATED (MANDATORY INSPECTION/VOLUNTARY MAINTENANCE).

METROPOLITAN WASHINGTON COUNCIL OF GOVERNMENTS

- SEPT., 1979 -- MEETING TO BE HELD WITH MARYLAND, D.C., VIRGINIA, COG AND REGIONAL PLANNING COUNCIL OF BALTIMORE OFFICIALS TO DISCUSS DEVELOPMENT OF REGIONALLY COMPATIBLE I/M PROGRAMS AND STANDARDS.

Vehicle Model Year	Exhaust Emissions Standard	
	CO	HC
1967 or older	6 %	700 ppm
1968-1970	5 %	400 ppm
1971-current	4 %	300 ppm

D.C. DOT is the lead agency for I/M. A work plan has been scheduled to implement mandatory inspection and voluntary maintenance no later than December 31, 1981.

On December 26, 1978, D.C. submitted a revised State Implementation Plan (SIP) to EPA, which cites D.C. 1-132 as the required enabling legislation to implement I/M. However, D.C.'s commitment to I/M is subject to a contingency. It would not become effective "until equivalent provisions are adopted by both the Commonwealth of Virginia and the State of Maryland for their portions of the . . . Region" (D.C. Law 1-132, Section 6.603(g)). Additional qualifiers to D.C.'s I/M commitment are contained in the SIP regarding: availability of "final cost estimates," District Council budget approval," and "changes in automobile technology that would make I/M obsolete."

EPA has since notified D.C. that these contingencies must be removed to gain SIP approval. (See Federal Register, Vol. 44, No. 124, June 26, 1979). EPA contends that D.C. DOT lacks authority for full I/M implementation because of the 1-132 contingency on I/M programs in Maryland and Virginia. EPA is also requesting inclusion in the SIP of a commitment to the development of I/M emission standards designed to result in a 25 percent reduction in hydrocarbon and carbon monoxide emissions by 1987.

In response, the District is currently drafting appropriate language to amend the contingency clause in D.C. Law 1-132, to be submitted to the City Council in October. The proposed amendment commits the District to I/M implementation no later than December 31, 1981, but still encourages equivalent I/M actions by Virginia and Maryland. Necessary SIP revisions are also being developed for re-submittal to EPA.

I/M Across the Country: Some Optimism, Some Frustration

The Washington and Baltimore Metropolitan areas are not alone in starting up I/M programs. Eight states already have I/M programs in operation, and considerable variation exists in types of test facilities, inspection fees and frequency, and other program elements. (See comparison table on page 7.)

How smoothly do I/M programs run? What level of emissions reduction can be expected? How well does the public accept I/M? The accomplishments and problems of these existing operations provide useful background information as I/M programs are being developed in Maryland, Virginia and the District of Columbia.

Arizona

Arizona's program appeared jeopardized after its first year when adverse public reaction led to a repeal I/M proposition placed on the State referendum ballot in 1976. It didn't pass, and the program has since gained increased public support--and resulted in a marked improve-

ment in air quality. From I/M data on vehicles of models in years 1964 to 1975 alone, the state reports an average 25 percent reduction in carbon monoxide (CO) emissions and 41 percent reduction in hydrocarbon emissions.

New Jersey

Average repair costs for vehicles failing an emissions inspection in New Jersey have been reported as \$32.40. A recent state survey revealed that 85 percent of the motorists would not favor eliminating I/M there. A recent report based on seven years of CO data contends that New Jersey has experienced a 28 percent reduction in CP levels as a result of I/M in combination with more stringent new car emissions standards.

California

Last Spring, the former decentralized I/M program conducted at private garages in Southern California since 1964 was switched to a state-contracted, centralized system of facilities. The

STATE/GEOGRAPHIC COVERAGE	TYPE OF SYSTEM ^M	IMPLEMENTATION CHRONOLOGY	INSPECTION FREQUENCY	INSPECTION ^N FEE
ARIZONA: MARICOPA (PHOENIX) AND PIMA (TUSCON) COUNTIES	STATE ADMINISTERED, PRIVATE CONTRACTOR OPERATED; CENTRALIZED; 12 PERMANENT STATIONS; ONE MOBILE STATION (TOTAL 36 LANES)	12/75: VOLUNTARY INSPECTION 1/76: MANDATORY INSPECTION 1/77: MANDATORY MAINTENANCE	ANNUAL--REQUIRED FOR VEHICLE REGISTRATION	\$5.70 (INCLUDES 1 FREE RETEST)
CALIFORNIA: SOUTH COAST AIR BASIN	STATE ADMINISTERED, PRIVATE CONTRACTOR OPERATED; CENTRALIZED; 17 FACILITIES (43 TO 45 LANES)	10/79: TEST PROGRAM (TRIAL INSPECTION & SURVEILLANCE) 1/79: MANDATORY PROGRAM	REQUIRED FOR NEW VEHICLE REGISTRATION AND CHANGE OF TITLE (ANNUAL IN 1981)	\$12.00
ILLINOIS: CITY OF CHICAGO	CITY OWNED AND OPERATED; CENTRALIZED; 5 PERMANENT (2 LANES EACH), 6 MOBILE STATIONS (2 LANES EACH)	1975: MANDATORY BUT NO ENFORCEMENT 1978: EPA CHALLENGED, NO CITY/STATE ACTION	NO ENFORCEMENT	NO DIRECT FEE (PRORATED PORTION OF VEHICLE REGISTRATION COVERS PROGRAM)
OHIO: CITIES OF CINCIN- NATI AND NORWOOD	CITY OWNED AND OPERATED, CENTRALIZED; ONE STATION, INCLUDES SAFETY INSPECTION	1/75: FULLY MANDATORY, NO VOLUNTARY PHASE IN	ANNUAL--REQUIRED FOR VEHICLE REGISTRATION	\$7.75 (INCLUDING SAFETY)
NEW JERSEY: STATEWIDE	STATE-OWNED AND OPERATED; CENTRALIZED; 39 SITES (63 LANES), 1 MOBILE VAN; CERTIFIED PRIVATE GARAGES FOR REINSPECTION OF FAILURES; INCLUDES SAFETY INSPECTION	7/77: MANDATORY INSPECTION/ VOLUNTARY MAINTENANCE 2/78: FULLY MANDATORY	ANNUAL--REQUIRED FOR VEHICLE REGISTRATION (2-YEAR EXEMPTION FOR NEW CARS)	\$2.50 (INCLUDES SAFETY, TAKEN OUT OF REGISTRATION FEE)
NEVADA: CLARK & WASHOE COUNTIES (LAS VEGAS & RENO)	STATE ADMINISTRATION, DECENTRALIZED TO LICENSED SERVICE STATIONS, GARAGES, AUTO DEALERS	10/74: PILOT PROGRAM 1/75: MANDATORY 1/81: MANDATORY ANNUAL	ONLY AT CHANGE OF TITLE; ANNUAL IN 1981	\$2.00
OREGON: PORTLAND METRO- POLITAN SERVICE DISTRICT	STATE-OWNED (OR LEASED) AND OPERATED CENTRALIZED SYSTEM; 7 PERMANENT (14 LANES), 2 MOBILE (2 LANES) STATIONS	1/74: VOLUNTARY PROGRAM 7/75: FULLY MANDATORY PROGRAM	BIENNIAL--REQUIRED FOR VEHICLE REGISTRATION	\$5.00
RHODE ISLAND: STATEWIDE	STATE CERTIFIED, FRANCHISED PRIVATE GARAGES, DECENTRAL- IZED; LINKED TO SAFETY INSPECTION SYSTEM	11/1/77: MANDATORY INSPECTION VOLUNTARY MAINTENANCE 1/1/79: FULLY MANDATORY PROGRAM	ANNUAL	\$4.00

^{1/} BASED ON MOST CURRENT INFORMATION AVAILABLE FROM STATES, EPA, AND MOTOR VEHICLE MANUFACTURERS' ASSOCIATION, SIP INFORMATION SERVICE.

^M ALL SYSTEMS USE FIVE-MINUTE TEST PROCEDURES.

California Air Resources Board had been disappointed with the recorded 4.5 percent reduction in motor vehicle emissions resulting from the former I/M system, as compared with an expected 40 percent reduction. A state investigation of private garages conducting I/M tests revealed substantial evidence of improper diagnosis and repair, as well as falsified permits. Both the Board and the State Consumer Affairs Department are optimistic that the new centralized system will be more effective in reducing emission pollutants, and also reduce costs for motorists by ensuring proper diagnosis of necessary repairs.

Next Issue:

Maryland Public Meeting Highlights
Setting Emissions Standards--
Stringency Factors, Failure Rates,
Regional Computability

Rhode Island

After serious consideration of a centralized I/M system, Rhode Island decided to implement a state licensed private garage program in coordination with the state's existing safety inspection program. A limited survey of Rhode Island motorists, conducted during the program's voluntary phase, indicated that 86 percent considered emissions tests to be important. Many others were not aware of the requirements and benefits of I/M. Along with increasing public awareness, the state is now devising remedies to correct such program deficiencies as inaccurate gas calibration, clarification of exempt vehicles, collection and analysis of emissions and repair data, inspector proficiency testing, and safeguards to ensure mechanics' competency.

On The Local Front.....

Several jurisdictions in the three-state area have already given I/M some practical exposure:

The Washington Metropolitan Air Quality Plan for Control of Photochemical Oxidants and Carbon Monoxide adopted by the COG Board of Directors on November 29, 1978, identified I/M as a measure with high potential improvement for air quality in the region, among those alternatives considered. In reviewing the plan, many of COG's 16 member jurisdictions endorsed I/M program implementation.

The Montgomery County Department of Environmental Protection sponsored demonstration I/M tests at shopping center parking lots during June of 1978.

A 40-hour mechanics training workshop for vocational instructors was held in Northern Virginia during January, 1978, sponsored by the Council of Governments and EPA. Directed at "training the trainers," the workshop utilized emissions repair training modules developed by Colorado State University. Northern Virginia Community College is presently using the workshop's materials in their automotive technology curriculum.

The Council of Governments' air quality staff, in October 1977, organized a cooperative, voluntary I/M project with the region's vocational education programs. A total of 13 schools from 6 local school systems were involved in the month-long effort, reflecting participation from the region's three states.

Since 1972, the Fairfax County Air Pollution Control Division has been con-

ducting a voluntary automobile emissions testing program each summer. Through an agreement with EPA's Mobile Source Enforcement Division, the County provides an emissions analyzer and testing location, and EPA provides inspection personnel. In 1978, 866 cars were tested.

In the District of Columbia, the D.C. Bureau of Motor Vehicle Services participated in the National Highway Traffic Safety Administration's Diagnostic Demonstration Program from 1975 to 1977. Under the program, 7,491 vehicles undergoing regular safety inspections were given voluntary exhaust emissions inspections utilizing an idle test mode.

Health Effects

A massive air pollution accident occurs: a railroad car of chlorine overturns, emitting gas into the air. The impact is immediate, tangible. People can quickly see, smell and feel the effects. Within hours, news of the event spreads across the country.

By contrast, the effects of chronic, low-level exposure to pollutants are far less easy to determine. Pollution is hard to see, and the automobile is such an integral part of people's lives that it is difficult to be concerned about auto emissions.

Beginning in the next issue of I/M NEWS, a regular feature on health effects will examine current scientific research for explanations of the impacts of automobile emissions on the public's health. Articles will include a discussion of COG's Air Quality Index (AQI), how it is measured and what it means in terms of pollution and health.



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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ANN ARBOR, MICHIGAN 48105

September 1980

OFFICE OF
AIR, NOISE AND RADIATIONINSPECTION/MAINTENANCE (I/M) PUBLIC AWARENESS MATERIALSFILMS

On the Road to Clean Air - A 17-minute, 16 mm color film covers purpose and need for I/M programs, the benefits and costs and how a program operates. Available from your local ALA chapter or from EPA Regional Offices on a free-loan basis.

Charlie Brown Cleans the Air - A 6 minute, 16 mm color film where Schultz's popular characters talk about the air pollution problem. Produced by the ALA with assistance from EPA.

VIDEOTAPES

Implementing an I/M Program - Some Notes for Planner - A 30 minute tape comparing the Portland, Nevada, Phoenix, and New Jersey I/M programs.

EPA and the Automobile - A 30 minute tape interview of Michael Walsh, DAA for Mobile Source Air Pollution Control and Benjamin Jackson, DAA for Mobile Source and Noise Enforcement. It discusses how the auto and its maintenance effects air pollution.

I/M Demonstration and the New Jersey Program - A 8 minute videotape of an EPA official explaining and demonstrating the I/M process with a test vehicle, along with a short run-through of the New Jersey I/M program. Designed for use by T.V. news programs.

T.V. SPOTS

I/M Auto Pollution - Animation - A 30 second, color PSA

I/M Auto Pollution - Computer Graphic - A 30 second, color PSA

SLIDE SHOW

"I/M For Cleaner Air" - a 7 minute color slide show with audio explaining the basic I/M story, September 1980.

PUBLICATIONS

Information Document on Automobile Emissions Inspection and Maintenance Programs - EPA-400/2-78-001 (February 1978) a report produced pursuant to Section 108 of the Clean Air Act which presents substantial information on all aspects of inspection/maintenance programs.

Motor Vehicle Emission I/M Information Kit - EPA-460/3-78-013 dated September 1978, discusses benefits, costs, training legislation, implementation and public information for I/M.

Get a Check-up for your Car! - A leaflet on the need for keeping cars well maintained to cut pollution along with pointers on what can go wrong with your engine and what to do about it. Available in English and Spanish from your local ALA chapter or EPA Regional office.

I/M Fact Sheet (MSAPC) - A seven page "Questions and Answers" about I/M programs.

Do You Own A Car? - A leaflet which explains pollution control systems and gives the reasons why motorists should not tamper with those devices, January 1978.

Mechanics...A New Law Affects You - A leaflet which explains the anti-tampering law and its consequences for mechanics. Also available in Spanish, November 1977.

Measuring Air Quality - A leaflet which explains the new pollutant standards index for reporting air quality in the mass media, July 1978.

Unleaded Gas...The Way to Go - Describes what fuel switching is and the impact on air quality, September 1978.

What You Should Know About Your Auto Emission Warranty, June 1979.

So Your Car Failed the Emission Test! - A guide for proper maintenance for those who want to do it right.

If You Live in High-Altitude Areas - Denver, Salt Lake City, Albuquerque, Colorado Springs -- for health sake, buy a high-altitude car, December 1979.

Cleaning the Air, EPA's Program for Air Pollution Control - A leaflet, June 1979

Highlights of the Clean Air Act Amendments of 1977 - April 1979

Ozone It's Effects and Control - A booklet, April 1979

NEWSLETTER

"I/M UPDATE" - published bi-monthly. Available from EPA Regional Offices or EPA, Ann Arbor, Michigan.

POSTER - A 9 x 12 inch, blue and white poster of a family in a car, with the words "Tune-up for Clean Air and Save Gas Too!"

TECHNICAL PAPERS/REPORTS - (Limited copies available for references only)

Effects of Inspection and Maintenance Programs on Fuel Economy - Discusses possible fuel savings resulting from I/M maintenance procedures, March 1979 - Revised June 1979.

Questions and Answers Concerning the Technical Details of Inspection and Maintenance - Includes information on emission reductions, maintenance and repair costs, and the economic social impact of I/M. There is also a discussion of implementation aids and obstacles, April 1979.

Reducing Air Pollution from Motor Vehicles - Developments in the In-Use Strategy, APCA Paper No. 79-7.1, June 25, 1979. (Discusses how I/M complements the Federal Motor Vehicle Emission Control Program).

Analysis of Oregon's I/M Program, APCA Paper No. 79-7.3, June 25, 1979.

Update on EPA's Portland Study, APCA Paper No. 80-1.2, June 24, 1980.

EPA Report on "Centralized I/M Program Cost Calculation Worksheet", August, 1979.

EPA Report on "Decentralized Private Garage I/M Program Cost Calculation Worksheet", August, 1979.

"The Need for I/M for Current and Future Motor Vehicles" - SAE Technical Paper No. 790782, August, 1979. "Exhaust Emissions from In-Use Passenger Cars Equipped with Three-Way Catalysts" - Technical Report, June 1980. Both are available by writing to Society of Automotive Engineers, Inc., 400 Commonwealth Dr., Warrendale, Pennsylvania 15096.

EPA Comments on the American Automobile Association's (AAA) Position on Motor Vehicles Exhaust Emission Inspection and Maintenance, December, 1979.

Light Duty Vehicle and Light Duty Truck Emission Performance Warranty; Short Tests and Standards, December 1979.

Analysis of In-House I/M Testing of a Three-Way Chevrolet Citation and a Three-Way Dodge Aspen, January 1980.

Natural Sources of Ozone: Their Origin and Their Effect on Air Quality March, 1980.

Analysis of Propane Gas Used as a Screen on the Portland Element III Sample March, 1980.

A Survey of Operating I/M Programs - prepared by Radian Corp., April 18, 1980.

Exhaust Emissions From In-Use Passenger Cars Equipped With Three-Way Catalysts June, 1980.

OTHER

Emission Inspection Demonstration - A leaflet which explains the EPA mobile van inspection demonstration.

The National Center for Vehicle Emissions Control and Safety - A description of their training programs and technical assistance projects. Available through EPA in Ann Arbor, Michigan or the Department of Industrial Sciences, Colorado State University, Fort Collins, Colorado.

These materials are available at EPA Regional Offices or at EPA Ann Arbor, Michigan - To receive copies, call your I/M Representative:

Region 1, Boston

Peter Hagerty, Air Programs - (617)223-5630

Gail Peterson, Public Information - (617)223-0967

Region 2, New York

Paul Truchan, Air Programs - (212)264-2551

Herman Phillips, Public Information - (212)264-2515

Region 3, Philadelphia

Chuck Miesse, Air Programs - (215)597-8180

Caroline Pratt, Public Information - (215)597-9826

Region 4, Atlanta

Ron McHenry, Air Programs - (404)881-2864

Gordon Kenna, Public Information - (404)881-3004

Region 5, Chicago

Carl Nash, Air Programs - (312)886-6069

Kent Kozina, Public Information - (312)886-6063

Region 6, Dallas

Ragan Broyles, Air Programs - (214)767-2742

Eddie Lee, Public Information - (214)767-2630

Region 7, Kansas City

Mickey Marshall, Air Programs - (816)374-3791

Rowena Michaels, Public Information (816)374-5894

Region 8, Denver

Dale Wells, Air Programs - (303)327-3711

Nola Cooke, Public Information - (303)327-5927

Region 9, San Francisco

Phil Bobel, Air Programs - (415)556-7288

Steve Drew, Public Information - (415)556-0217

Region 10, Seattle

George Able, Air Programs - (206)442-1226

Bob Jacobson, Public Information - (206)442-1203

Motor Vehicle Emissions Laboratory, Ann Arbor, MI

Mat Simoncini, Public Information Officer - (313)668-4223 FTS 374-8223

Rocco De Pietro, Public Information Specialist - (313)668-4278 FTS 374-8278



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

ANN ARBOR, MICHIGAN 48105

I/M PUBLIC OPINION SURVEY
OF OPERATING PROGRAMSOFFICE OF
AIR, NOISE AND RADIATION

It's encouraging to report that public opinion surveys in four states with operating I/M programs found that a majority of those polled responded favorably towards I/M programs.

Arizona:

Q: "Arizona has had an emissions inspection program for cars and trucks for about three years now. Do you feel the program should be kept or repealed?"

A: Of 600 residents polled in Arizona (Maricopa and Pima Counties), 58% favored retention of the existing I/M program because they felt air pollution is a serious health problem. This survey was conducted in May, 1979, by the Arizona State University Survey/Research Center

California:

Q: "In the near future, everyone may be required to have their cars inspected for emissions each year. The way you feel now would you tend to oppose or favor annual emissions inspections?"

A: In the California South Coast Air Basin, more than 67% of 600 residents polled favored annual auto emission inspections. This survey was conducted in April, 1979, for the California Air Resources Board.

New Jersey:

Q: "In the past, for economic reasons, there have been recommendations to eliminate our mandatory vehicle inspection program. Do you agree or disagree?"

A: Random distribution of 3,245 questionnaires to New Jersey motorists as they arrived at the inspection station found 83% favoring continuation of the I/M program. This public opinion survey was conducted in February, 1978, by the New Jersey Motor Vehicle Inspection Study Commission.

Rhode Island:

Q: "Do you think that exhaust emissions tests on automobiles are important?"

A: In Rhode Island, 85% of the participants considered the I/M program to be important. This survey was conducted during April and May, 1979, by the Research Corporation of New England for the Rhode Island Lung Association.

These surveys suggest that with a good understanding of the need for and benefits of the program the public is receptive to I/M.

REFERENCE B-2
I/M PUBLIC OPINION SURVEY

TABLE 1.9 PUBLIC INFORMATION

TYPE OF PROGRAM	NEW JERSEY	CINCINNATI	OREGON	ARIZONA	CALIFORNIA	NEVADA	RHODE ISLAND
Preliminary/ Voluntary Test Programs	1-1/2 year program Mandatory inspection Voluntary Maintenance		1 year voluntary program	1 year mand. inspection/ voluntary maintenance	Phase I volun- tary program. 50,000 vehicles tested	Voluntary test- ing sponsored by Lung Assoc. and DMV	1 year mand. inspection/ voluntary main- tenance
Pamphlets	Developed by EPA and state	Distribute EPA handbook at first. Cur- rently distribute their own pamphlet	Developed by state & EPA. Reminder with registration forms.	Developed by state, EPA, & contractor	Distribute pam- phlet describ- ing program & repair facil. Do not encourage do it yourself repair	Notices dev't by DMV. Distribute EPA pamphlet	Lung Associa- tion developed pamphlets with EPA grant.
Use of Challenge Station or Laboratory	Laboratory is open by appointment			Approx. 10 veh/day have diagnostics performed at laboratory	Challenges made at lanes	Complaints, diagnosis	Customer may have vehicle checked for free after garage inspection. (rarely used)
Telephone Assis- tance (Consumer Hot-Lines)	DEP Personnel Answer questions and refer people to the labora- tory	City and County personnel in- volved will answer questions	Public may call DEQ. No formal hot line	Contractor maintains toll free # (watts). Cus- tomers can also call state.	Contractor main- tains toll free # (watts). Cus- tomers can also call B.A.R.	DMV number is well publicized	May call DOT. No formal DOT hot line Lung Assoc. has hot line (rarely used)
Radio & Television Ads or Public Ser- vice Announcements				Contractor placed prime time ads (advise to avoid end of month)	Contractor placed prime time ads at beginning of pro- gram	DMV & county officials appear on talk shows	Chief appeared on question & answer shows
Other Programs	Press releases, Public van demonstrations. Pro- vide customer with list of repair facilities	Press releases to improve relations	Press coverage, DEQ bulletins, bumper stickers	Press releases, opinion sur- veys	Press releases, opinion surveys	Set-up booth at county fair	Attempts to im- prove press rela- tions. Attitudi- nal survey spon- sored by EPA Re- gion I
Manpower Requirements	15 hours/week for diagnostic technician	None	Less than 1 person	1 person - fulltime for diagnostic technician	ARB - 1 person, BAR - 9 people to handle complaints	1 person full- time in labor. (not all P.I. work)	1 person in DEM coordinates public education programs. Other responsibilities

*Prepared by Radian Corporation - April 17, 1980